

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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DEVIN G. NUNES,

Plaintiff,

- against -

NBCUNIVERSAL MEDIA, LLC,

Defendant.
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Case No.: 22-cv-1633-PKC-SN

ORAL ARGUMENT REQUESTED

**DECLARATION OF JASON C. GREAVES IN OPPOSITION TO
DEFENDANT'S MOTION FOR SUMMARY JUDGMENT AND SANCTIONS**

I, JASON C. GREAVE, declare as follows:

1. I am a Partner at Binnall Law Group, counsel to Plaintiff Devin G. Nunes.
2. I make this declaration in order to annex exhibits relied upon in opposition to Defendant NBCUniversal Media, LLC's Motion for Summary Judgment and Sanctions.
3. Annexed hereto as **Exhibit A** is a true and correct copy of transcript excerpts from the deposition of Nicholas Ciarlante, taken in this action on July 25, 2024.
4. Annexed hereto as **Exhibit B** is a true and correct copy of transcript excerpts from the deposition of Allen Souza, taken in this action on September 11, 2024.
5. Annexed hereto as **Exhibit C** is a true and correct copy of transcript excerpts from the deposition of Jack Langer, taken in this action on July 12, 2024.
6. Annexed hereto as **Exhibit D** is a true and correct copy of transcript excerpts from the deposition of Derek Harvey, taken in this action on September 6, 2024.
7. Annexed hereto as **Exhibit E** is a true and correct copy of transcript excerpts from the deposition of Plaintiff Devin Nunes, taken in this action on February 8, 2024.

8. Annexed hereto as **Exhibit F** is a true and correct copy of transcript excerpts from the deposition of Rachel Maddow, taken in this action on September 19, 2024.

9. Annexed hereto as **Exhibit G** is a true and correct copy of transcript excerpts from the deposition of Cory Gnazzo, taken in this action on August 8, 2024 .

10. Annexed hereto as **Exhibit H** is a true and correct copy of a March 18, 2021, email that was produced by NBCU in this action with the bates stamp NBCU0001726.

11. Annexed hereto as **Exhibit I** is a true and correct copy of the March 18, 2021, transcript of the Rachel Maddow Show that was produced by NBCU in this action with the bates stamp NBCU0000062-82.

12. Annexed hereto as **Exhibit J** is a true and correct copy of a March 18, 2021, email that was produced by NBCU in this action with the bates stamp NBCU0000086.

13. Annexed hereto as **Exhibit K** is a true and correct copy of a March 18, 2021, email that was produced by NBCU in this action with the bates stamp NBCU0001717-21.

14. Annexed hereto as **Exhibit L** is a true and correct copy of NBCUniversal News Group's Policies and Guidelines that was produced by NBCU in this action with the bates stamp NBCU0000002-61.

15. Annexed hereto as **Exhibit M** is a true and correct copy of transcript excerpts from the deposition of Jennifer Morrow, taken in this action on August 10, 2023.

16. Annexed hereto as **Exhibit N** is a true and correct copy of transcript excerpts from the deposition of Sofia Miller, taken in this action on September 17, 2024.

17. Annexed hereto as **Exhibit O** is a true and correct copy of an excerpt from an NBC policy document produced by NBCU in this action with bates stamp NBCU0000002-8.

18. Annexed hereto as **Exhibit P** is a true and correct copy of the May 22, 2017, transcript of the Rachel Maddow Show that was produced by NBCU in this action with the bates stamp NBCU0000272-88.

19. Annexed hereto as **Exhibit Q** is a true and correct copy of the September 15, 2017, transcript of the Rachel Maddow Show that was produced by NBCU in this action with the bates stamp NBCU0000440-56.

20. Annexed hereto as **Exhibit R** is a true and correct copy of the December 7, 2017, transcript of the Rachel Maddow Show that was produced by NBCU in this action with the bates stamp NBCU0000492-509.

21. Annexed hereto as **Exhibit S** is a true and correct copy of the January 24, 2018, transcript of the Rachel Maddow Show that was produced by NBCU in this action with the bates stamp NBCU0000574-90.

22. Annexed hereto as **Exhibit T** is a true and correct copy of the February 2, 2018, transcript of the Rachel Maddow Show that was produced by NBCU in this action with the bates stamp NBCU0000625-41.

23. Annexed hereto as **Exhibit U** is a true and correct copy of the February 5, 2018, transcript of the Rachel Maddow Show that was produced by NBCU in this action with the bates stamp NBCU0000642-49.

24. Annexed hereto as **Exhibit V** is a true and correct copy of the February 26, 2018, transcript of the Rachel Maddow Show that was produced by NBCU in this action with the bates stamp NBCU0000659-74.

25. Annexed hereto as **Exhibit W** is a true and correct copy of the April 23, 2018, transcript of the Rachel Maddow Show that was produced by NBCU in this action with the bates stamp NBCU0000675-90.

26. Annexed hereto as **Exhibit X** is a true and correct copy of the May 21, 2018, transcript of the Rachel Maddow Show that was produced by NBCU in this action with the bates stamp NBCU0000691-706.

27. Annexed hereto as **Exhibit Y** is a true and correct copy of the January 15, 2020, transcript of the Rachel Maddow Show that was produced by NBCU in this action with the bates stamp NBCU0000776-94.

28. Annexed hereto as **Exhibit Z** is a true and correct copy of the January 17, 2020, transcript of the Rachel Maddow Show that was produced by NBCU in this action with the bates stamp NBCU0000795-808.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: January 13, 2025

/s/ Jason C. Greaves
Jason. C. Greaves